

Places for Everyone Representation 2021

Family Name	Hall
Given Name	Philip
Person ID	1286097
Title	Stakeholder Submission
Type	Web
Family Name	Hall
Given Name	Philip
Person ID	1286097
Title	JPA 35: North of Mosley Common
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Traffic on Mosley Common/East Lancs road already over capacity. Increased pollution especially around Saint Johns Primary school. Increased pressure on local facilities, eg schools doctors</p> <p>This planned development will impact on residents health and wellbeing. "Places for everyone" is an absolute misnomer and should read "profit above wellbeing"</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Cancel this development

Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Stakeholder Submission
Type	Web
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Our Vision
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The PfE plan is contra to every point of the vision statement published.</p> <p>The plan has not been positively prepared. It is the transition from a failed GMSF and questionable whether it is even legal.</p> <p>It is not justified. The plan uses 2014 data to predict housing need and ignores the post Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONA predictions and take into account the effect of Covid on work patterns.</p> <p>It is inconsistent with National Policy. The plan for Bury is completely at odds with the house building strategy relating to brownfield development and greenbelt protection. almost entirely on greenbelt for the proposed housing in Bury goes against national policy to be used only as a last resort. It is contra to the policies on environment and climate change.</p> <p>It is not effective as a plan. It is based on outdated information and is therefore not a reflection of the current needs of Bury. There is a lack of information particularly in relation to infrastructure requirements, employment opportunities and skills matching. There is no information on how the required infrastructure will be paid for. There are no partnerships identified for employment provision and there has been a lack of transparency on any needs for prospective industries. The housing developments are sited away from the proposed centres with no synergy between housing and jobs proposals.</p> <p>It is doubtful whether the plan is legally compliant. As stated above, the plan is a transition from a GMSF but all sections of the plan have seen some change. It is therefore not likely that the Town and Country Planning regulations would be automatically satisfied without further work.</p> <p>The plan has not been prepared in accordance with the duty to co-operate. With the withdrawal of Stockport from the GMSF the plan was undermined. PfE does not set out how the relationship between Stockport and the remaining boroughs will be maintained or how for example Bury will be supported by the boroughs outside of the PfE plan. The withdrawal undermines the plan for Greater Manchester and more reliance should be placed on local plans.</p>
Redacted modification - Please set out the	The plans should be rewritten taking into account the latest information on housing need and with planning approvals already in place. A brownfield first approach in line with Government policy.

modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	together with greater protection of greenbelt land should be proposed. Full transparency in site selection, infrastructure plans and their funding together with employment needs analysis should be incorporated. Local plans should be published and proper engagement with residents should be undertaken.
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ul style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>In the case of the plan for Bury almost all development is on Greenbelt land. Despite the guidance by Bury MBC that the council has a brownfield first approach they admitted that this was not the case and should the council themselves be the builders. As this is not the case it is clear that the greenbelt should be severely depleted.</p> <p>The site selection process was opaque with no explanation as to why some sites in the plan were excluded from the plan. The process should be repeated using National and GPG guidance for site selection. Meetings with public representation should be held and minutes should be available. The rationale for the selection/rejection of every site should be available including consideration of other alternatives.</p> <p>The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.11 of the NPPF states of the Walshaw allocation, "This is an extensive area of land □□ set entirely within the existing urban area. The land is loosely bounded by the urban areas of Tottington to the north and Elton to the east Lowercroft to the south and Walshaw to the west." Filling in this area will create an urban sprawl contrary to NPPF para 137 and para 138 a,b,c and e.</p> <p>There has been no evidence of the existence of exceptional circumstances to justify the release of the greenbelt boundaries to allow building on the Walshaw allocation as is required by para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. The guidance states that housing need is not a target but merely a starting point and figures</p>

	<p>upwards or downwards according to local circumstances, eg lack of brownfield, economic recovery (due to Covid-19).</p> <p>To prove that exceptional circumstances to justify alteration to greenbelt boundaries requires evidence that all other reasonable options to meet identified need have been exhausted (NPPF para 141). This must include maximising use of brownfield and underutilised sites to increase housing density.</p> <p>The proposed building in Walshaw will significantly increase the volume of traffic due to the need to travel away from the proposed employment sites, in a semi rural area with limited transport infrastructure. As an example of lack of proper planning I can describe my own road. The rural road which is narrow and of poor width with blind bends and has been described as "dangerous" due to the volume of traffic using it. The plan however shows no infrastructure improvement and redesignates the road as a "primary route".</p> <p>There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.</p> <p>The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in which the assessment was therefore not impartial.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be revisited based on up to date housing needs assessments with regard to the process of site selection and taking into account independently prepared housing needs assessments and environmental assessments. The reliance on greenbelt for ease of development should be replaced by a proper brownfield first policy which holds developers accountable for sustainable, affordable, and environmentally friendly, affordable housing .
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Our Spatial Strategy
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not	No evidence within plan that it will boost northern competitiveness. No evidence of investment that would be attracted to Northern should the plan go ahead. It is not a plan but a wish

to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Needs to be rewritten to ensure employment is achievable and housing ties in with sites which the Bury plan does not
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-Strat 6 Northern Areas
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan for Bury is not in line with the strategy - housing is planned too far away from a for employment, virtually all on greenbelt with no adequate infrastructure or evidence
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Needs to be rewritten using up to date information and based on proper researched
Family Name	Halliwell

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Given Name	Julie
Person ID	1286360
Title	JP-Strat 13 Strategic Green Infrastructure
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Building almost entirely on greenbelt land in Bury without due regard to residents use countryside and attempting to replace the green assets with small newly designated ' is inadequate and clearly not fit for purpose does not make sense and is contra to the Reports on ecological impact have not been independent and therefore should be de for purpose. Much of the planned areas are subject to flooding so protect the existing Insufficient regard has been made to ecological damage should the residential devel go ahead.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Needs to be rewritten taking into account protection of greenbelt land both for the well-b and protection of land from ecological damage
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-Strat 14 A Sustainable and Integrated Transport Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan does not meet the outlined strategy. In the case of Bury the housing is planned from existing transport links in semi rural areas with no thought to road infrastructure from planned industrial sites thereby increasing traffic etc
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Needs to be rewritten to maximise brownfield sites nearer to town centre and to propose sites to minimise damage to green infrastructure. This would be in line with climate change and protect from environmental damage
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-S 1 Sustainable Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>In respect of policy JPS-1, in the case of the plan for Bury the proposals are directly outlined policy on sustainable development. The proposed building of c5000 houses on greenbelt land is contra to the policy on greenbelt protection. The purpose of the NPPF protection is to prevent urban sprawl. Para 11.119, page 271 of PfE states of the Wa "This is an extensive area of land □□ set entirely within the existing urban area. The site is bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east, the south and Walshaw to the west." Filling in this green belt site will create an urban area in contravention to NPPF para 137 and para 138 a,b,c and e.</p> <p>There has been no evidence of the existence of exceptional circumstances to justify the greenbelt boundaries to allow building on the Walshaw allocation as is required by para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. NPPF guidance states that housing need is not a target but merely a starting point and figures should be set upwards or downwards according to local circumstances, eg lack of brownfield, economic conditions (including Covid-19).</p>

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	To prove that exceptional circumstances to justify alteration to greenbelt boundaries requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites and increasing housing density.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to take into account maximising brownfield sites, use of brownfield and up to date housing needs assessments. In addition independent ecological surveys should be undertaken.
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-S 4 Resilience
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan for Bury does not rely on retrofitting but on a developer led new build strategy. The proposed areas are ecologically and socially important to residents and include areas which are greenfield plains. The Bury plan therefore does not stand scrutiny against the resilience policy. The reliance on building almost entirely on greenbelt land in Bury will have a significant impact on health and air quality of residents.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Rewrite required to give greater resilience to climate change agenda including development of brownfield sites and review of empty housing
Family Name	Halliwell

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Given Name	Julie
Person ID	1286360
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Whilst there are laudable policies within the agenda for jobs there is little evidence of employers and industries would be encouraged or would want to invest in Bury. The p "build it and they shall come"which is not a plan but a wish list. There is little synergy employment and housing requirements which could have the potential of building on increasing car journeys as their could be a mismatch between the two.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten taking into account proper research into employment investment potential with proper safeguards to protect greenbelt and climate change
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-J 2 Employment Sites and Premises
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No

Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Whilst there are laudable policies within the agenda for jobs there is little evidence of employers and industries would be encouraged or would want to invest in Bury. The p "build it and they shall come"which is not a plan but a wish list. There is little synergy employment and housing requirements which could have the potential of building on increasing car journeys as their could be a mismatch between the two.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten taking into account proper research into employment investment potential with proper safeguards to protect greenbelt and climate change
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan for Bury relies on development almost entirely on greenbelt land which is cont and not in line with national guidelines.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the	Rewrite the plan looking at the up to date housing requirements, site selection (which existing plan) and brownfield first policy.

plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-H 2 Affordability of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	There is little within the Bury plan to require developers to build sustainably and affordably. Selected land tends to be larger less affordable housing with a requirement on car transport with little regard to road infrastructure
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Plan should be rewritten in line with policy and national guidelines on protection of green spaces and climate change agenda
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-H 3 Type Size and Design of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

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Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	There is no legal requirement for developers to build in line with the policy and it is high that the policy will be totally disregarded in preference to larger, more expensive and p friendly housing
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Site selection in Bury should be realigned with areas of need closer to public transport employment areas which they currently are not anywhere near. Any housing development with it more prescriptive eco credentials and affordable housing requirements
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-H 4 Density of New Housing
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to	The plan for Bury is counter to the strategy with greater reliance on density of housing on greenbelt well away from existing road and transport infrastructure and also from pl in industrial/employability development.

co-operate. Please be as precise as possible.	
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to ensure a better distribution of housing across the borough, full use of brownfield availability, plans already in the pipeline/underway and minimising development by building closer to existing transport network and employment areas
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 1 Valuing Important Landscapes
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The housing plan for Bury is almost entirely dependent on greenbelt release. Offsetting is unnecessary as proper regard to brownfield release and cross borough site selection has not been properly undertaken. The semi rural nature of the proposed development sites and the impact on the character of the affected communities which go towards making Bury a pleasant and popular place to live will be swept aside. This is contra to national policy on greenbelt protection, protection of green assets and ecological protection.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to ensure protection of green assets as well as community and environmental assets
Family Name	Halliwell
Given Name	Julie
Person ID	1286360

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Title	JP-G 2 Green Infrastructure Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	National guidelines require plans to be drawn up having due regard to the protection of green belt land. The plan for Bury is almost entirely dependent on housing developments in one area of green belt land. This is counter to national policy. The impact on existing areas of ecological, environmental, social, recreational would not be offset by the planned green infrastructure.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to take account of up to date housing needs, protection of brownfield first approach and with proper regard to equitable site selection and independent and environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 3 River Valleys and Waterways
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

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<p>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>The plan for Bury relies on destruction of vast areas of important green belt land surrounding the town. This currently provides public realm as well as being of environmental and ecological value. It provides social and recreational benefits to the residents of Bury. It is counter to national policy as the strategy outlined that this should be destroyed without due regard to alternative sites and up to date data as well as taking into account published independent ecological surveys and produced on behalf of developers who would benefit financially from the development.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>The plan needs to be rewritten to take account of up to date housing needs, protection of brownfield first approach and with proper regard to equitable site selection and independent surveys and environmental surveys</p>
<p>Family Name</p>	<p>Halliwell</p>
<p>Given Name</p>	<p>Julie</p>
<p>Person ID</p>	<p>1286360</p>
<p>Title</p>	<p>JP-G 4 Lowland Wetlands and Mosslands</p>
<p>Type</p>	<p>Web</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>The plan for Bury would destroy vast areas of important greenbelt with little regard to the protection of wildlife including protected species and the current access for recreation which has contributed to the physical and mental well-being of residents. This is counter to national policies on green belt protection, environmental protection, the climate change agenda and the protection of species under threat.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance</p>	<p>The plan needs to be rewritten to take account of up to date housing needs, protection of brownfield first approach and with proper regard to equitable site selection and independent surveys and environmental surveys</p>

or soundness matters you have identified above.	
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 5 Uplands
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan for Bury involves destruction of vast areas of important greenbelt land of distinct character that adds to the distinctive character of the semi rural nature of the area. This is directly against the strategy outlined and is against the national policies on protection of greenbelt land and the importance of ecological and environmental protection.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to take account of up to date housing needs, protection of greenbelt, brownfield first approach and with proper regard to equitable site selection and independent environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 8 Standards for Greener Places
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

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Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Replacing existing greenbelt land by built green infrastructure is counter to national protection.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to take account of up to date housing needs, protection of brownfield first approach and with proper regard to equitable site selection and independent environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan for Bury is dependent on the destruction of vast areas of greenbelt land. The areas for housing already are biodiverse, provide connectivity between habitats and much of the land is agricultural in nature. The plan therefore is counter to national policies on protection of greenbelt as well as being directly opposed to the policy/strategy meant to protect these areas. Where alternative solutions such as a brownfield first approach and alternative site selection are not considered to be legally compliant

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to take account of up to date housing needs, protection of greenbelt land, brownfield first approach and with proper regard to equitable site selection and independent and environmental surveys
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-G 10 Green Belt
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The housing plan for Bury is almost entirely based on destruction of the greenbelt land in one area of Bury. This is counter to national policy and the outlined policy/strategy and redesignating of land as greenbelt to "improve" the perceived loss of greenbelt in Bury does not satisfy the proper definition and purpose of greenbelt given the fractured nature, of redesignated land and type of reclassification.</p> <p>Building almost entirely on greenbelt land in Bury without due regard to residents use of countryside and attempting to replace the green assets with small newly designated 'green' areas is inadequate and clearly not fit for purpose does not make sense and is contra to the purpose of the Reports on ecological impact have not been independent and therefore should be done so for purpose. Much of the planned areas are subject to flooding so protect the existing greenbelt. Insufficient regard has been made to ecological damage should the residential development go ahead.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>The plan needs to be rewritten to take account of up to date housing needs, protection of greenbelt land, brownfield first approach and with proper regard to equitable site selection and independent and environmental surveys</p> <p>Needs to be rewritten taking into account protection of greenbelt land both for the well-being of the community and protection of land from ecological damage</p>
Family Name	Halliwell
Given Name	Julie

Places for Everyone Representation 2021

Person ID	1286360
Title	JP-P2 Heritage
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan for Bury relies on significant building on greenbelt land which is surrounded by semi rural areas. No consideration has been given to the infrastructure requirements of these areas. This is counter to national policy on protection of greenbelt land and policies of protection of heritage rich sites
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to take account of up to date housing needs, protection of brownfield first approach and with proper regard to equitable site selection, independence of environmental surveys and protection of heritage assets which make Bury a pleasant place to live
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-C1 An Integrated Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan for Bury relies on housing development predominantly on greenbelt land. The close to the proposed sites for employment infrastructure in the plan and there is inadequate infrastructure and transport improvement to provide accessible links without reliance on the link roads to the site of the new housing are semi rural narrow roads with blind bends and houses adjoining the roads. They are therefore unsuitable for traffic now without the intervention of houses. In fact my own road has been designated as "dangerous" because of the narrowness of traffic now using it. The plan will inevitably lead to more accidents on a road such as the many other narrow semi rural roads surrounding it. Indeed my own road has been designated as the plan as a cycle route with no planned infrastructure investment to mitigate the danger. It is not legal for a plan to cause potential danger to residents without due mitigation.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The plan needs to be rewritten to take account of up to date housing needs, protection of greenbelt, brownfield first approach and with proper regard to equitable site selection, independence of transport and environmental surveys and adequate infrastructure improvements. Building on brownfield would inevitably mean a wider distribution of sites across the borough and therefore less reliance on transport for major changes to infrastructure as they would be more likely to be sited nearer to existing transport networks. The current site selections are not adequately catered for by public transport and would require greater investment.
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-C3 Public Transport
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The plan for Bury relies on housing development predominantly on greenbelt land. The close to the proposed sites for employment infrastructure in the plan and there is inadequate infrastructure and transport improvement to provide accessible links without reliance on the link roads to the site of the new housing are semi rural narrow roads with blind bends and houses adjoining the roads. They are therefore unsuitable for traffic now without the intervention of houses. In fact my own road has been designated as "dangerous" because of the narrowness of traffic now using it. The plan will inevitably lead to more accidents on a road such as the many other narrow semi rural roads surrounding it. Indeed my own road has been designated as the plan as a cycle route with no planned infrastructure investment
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	The plan needs to be rewritten to take account of up to date housing needs, protection of greenbelt, brownfield first approach and with proper regard to equitable site selection, independence of transport and environmental surveys and adequate infrastructure improvements. Building on brownfield would inevitably mean a wider distribution of sites across the borough and therefore less reliance on transport for major changes to infrastructure as they would be more likely to be sited nearer to existing transport networks. The current site selections are not adequately catered for by public transport and would require greater investment.

of any legal compliance or soundness matters you have identified above.	
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-C5 Walking and Cycling Network
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The plan for Bury relies on building housing on vast areas of greenbelt which is not of benefit to the borough or to transport . However some roads designated as cycle routes would also inevitably be affected by the new housing developments (c5000 in one area) and adjoining towns and villages and therefore increase the dangers for road users.</p> <p>This is against the strategy/policy for greenbelt and the national policy on environmental protection and green strategy</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>The plan needs to be rewritten to take account of up to date housing needs, protection of greenbelt, brownfield first approach and with proper regard to equitable site selection, independence of sites and environmental surveys and adequate infrastructure improvements. Building on brownfield sites would inevitably mean a wider distribution of sites across the borough and therefore less impact on greenbelt for major changes to infrastructure as they would be more likely to be sited nearer to existing public transport networks. The current site selections are not adequately catered for by public transport and would require greater investment.</p>
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JP-C7 Transport Requirements of New Developments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound

Places for Everyone Representation 2021

Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The plan for Bury relies on building housing on vast areas of greenbelt which is not o transport . Little transport infrastructure improvements are included in the plan despi issue of increased traffic. Some roads designated as cycle routes would also inevitab link roads between the new housing developments (c5000 in one area) and adjoining therefore increase the dangers for road users.</p> <p>This is against the strategy/policy for greenbelt and the national policy on environme and green strategy</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>The plan needs to be rewritten to take account of up to date housing needs, protecti brownfield first approach and with proper regard to equitable site selection, independ and environmental surveys and adequate infrastructure improvements. Building on b would inevitably mean a wider distribution of sites across the borough and therefore le for major changes to infrastructure as they would be more likely to be sited nearer to transport networks. The current site selections are not adequately catered for by pub would require greater investment.</p>
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JPA 9: Walshaw
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The plan for Bury and specifically Walshaw, demonstrates major failings in meeting t strategy outlined as overarching requirements of PfE.</p> <p>Community involvement</p> <p>Bury Council have failed to comply with their Statement of Community Bury Involvement of the creation of the plan. There was no notification to residents of the initial call for still opaque in terms of options, decision making and officers/members present. The a making residents aware of the plan is disproportionately small (□100 as per the respor of Information request) in comparison to the effect it will have upon them.The Council disingenuous in presenting the plans to residents. eg residents only being told of the specific ward, and not being informed of the bigger picture across the borough, thus</p>

impression that the impact is less than it is. There has been an over reliance on residents finding things out for themselves on social media and websites and thus a failure to engage groups due to over reliance on the use of social media and technology. There has been a failure to use public internet, eg in libraries, during Covid. This has adversely and disproportionately affected people and those from deprived backgrounds. This is against the SCI 2.4 & 4.17. Covid restrictions are now lifted but restrictions still remain in place in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been inaccessible in terms of language used and have been a deterrent to becoming involved in the planning process as the language is wordy, long winded and intrusive, thus producing an irrelevant response rate.

NPPF & Greenbelt

As stated previously, the purpose of the NPPF greenbelt protection is to prevent urban sprawl. 11.119, page 271 of PfE states of the Walshaw allocation,

"This is an extensive area of land □□ set entirely within the existing urban area. The site is bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east, Elton to the south and Walshaw to the west." Filling in this green belt site will create an urban area in breach of NPPF para 137 and para 138 a,b,c and e.

There has been no evidence of the existence of exceptional circumstances to justify the alteration of the greenbelt boundaries to allow building on the Walshaw allocation as is required by NPPF para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. NPPF guidance states that housing need is not a target but

merely a starting point and figures can be mitigated upwards or downwards according to exceptional circumstances, eg lack of brownfield, economic shock (Brexit, Covid-19).

To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist requires evidence that all other reasonable options to meet identified need have been exhausted (NPPF para 141). This must include maximising use of brownfield and underutilised sites to increase density.

Ecological and needs assessments

There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for the benefit of developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent survey of housing need. However, they have a partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. The assessment was therefore not impartial.

Climate change & carbon neutral policy

In respect of Climate change policy and carbon neutral policy, Places for Everyone proposes employment sites on the other side of the borough from Walshaw on the M66 Northern Corridor, necessitating travel by car as no direct public transport route exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are only accessible from Walshaw by a long journey or an expensive, unreliable and infrequent bus service, again increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate congestion on the M66, merely transferring the problem from one place to another. No consideration has been given to the impact on the M66 in the direction of Bolton, Blackburn, Darwen etc with a major link road being a single lane road with blind bends which has been designated in the plan as a cycle route despite numerous reports from the Council's own officers stating it is now "dangerous".

Up to date information

The PfE indicates in Para 1.63 point 2 that the most up to date information be used in the assessment, so being the most recent Bury's Housing Development Needs Assessment 2020 must be given consideration.

Site selection

The site selection process for Bury has been especially opaque. Little information has been provided about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was de-

of informal meetings with no list of attendees or minutes available. This site choice ca as the most appropriate when no reasonable alternatives appear to have been exam options were ruled out too early or were not considered despite other areas having o access or being situated nearer to employment sites.

In addition, the Walshaw site performs poorly against site selection criteria and strongly a assessment criteria. Therefore the inclusion of the Walshaw site cannot be justified:

The Walshaw site only met one of the criteria for site selection, namely the most gen criteria, Criteria 7, land that would deliver significant local benefits by addressing a ma (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local pro in Walshaw is the extra traffic that will be created by the proposed 1250 new houses houses, there is not a major problem and the infrastructure proposed would not be n essentially a cyclical argument and not a specific justification for the inclusion of the

NB In the Site Selection Background Paper, Criteria 7 is missing from the table of site at pg 18.

The Walshaw allocation only meets 3 out of 10 of the broad objectives within Section (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.7):

- Objective 1 - Meet our housing need;
- Objective 5 - Reduce inequalities and improve prosperity;
- Objective 6 - Promote the sustainable movement of people, goods and information

Again, these objectives could be satisfied by any number of sites in the area.

The Walshaw site makes a strong or moderate to strong contribution to the purpose in each of the areas of the Greater Manchester Greenbelt Assessment 2016 (Site Al Paper JPA 9 Walshaw, pages 27 - 28, para 15.3):

To check the unrestricted sprawl of large built up areas Moderate-Strong

To prevent neighbouring towns from merging into one another Strong

To assist in safeguarding the countryside from encroachment Moderate-Strong

Preserving the setting and special character of historic towns Moderate-Strong

Site Allocation Topic Paper JPA 9 Walshaw at page 29 para 15.8 refers to The Green Assessment, 2020 which concluded that the Walshaw allocation makes a moderate checking the sprawl of Greater Manchester and safeguarding the countryside from e The allocation also makes a relatively limited contribution to maintaining the separati Tottington which are already merged to a significant degree. Release of the allocation cause moderate harm to Green Belt purposes.

The lack of selection criteria met and the harm that will be caused by the release of t greenbelt are evidence of the lack of justification for the selection of this site. In fact, an leader, David Jones, admitted in writing that sites had been selected due to their she ease of implementation of infrastructure, saying,

"the proposed strategy within the GMSF is to release a small number of large strateg Green Belt as these will provide the scale and massing of development that is neede viable delivery of the essential major infrastructure to support the development."

The needs of the Walshaw community have been overlooked in favour of mass urban this particular site rather than sites on the outskirts nearer motorway access, transpo employment sites. There is too much emphasis on economic growth at the expense physical health of residents with the benefits of the greenbelt being underestimated.

Infrastructure

The only way in which the funding levels required for infrastructure could be achieved v a 5% increase in the price of the properties on the site: Site Allocation Topic Paper- J pg 44, 45 and 46. Realistically, this makes the infrastructure for the site undeliverable

"The Three Dragons Viability Appraisal of the allocation has been run using the base showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport co produces a positive residual value both for the main and the sensitivity test. However,

in house prices of less than 5% would be required to accommodate the full strategic infrastructure identified.

26.3 With a small increase in values compared to the base model, the sensitivity test shows that the allocation would be able to support all policy costs including 25% affordable housing. The infrastructure required to support the development, including the strategic transport costs, is considered appropriate for this location as it is in a popular residential area and is close to Walshaw and the areas to the west of Bury where house prices are typically higher than the rest of the town."

There is no guarantee that higher house prices would be achieved. This also suggests that some infrastructure will not be contemporaneous with the building of houses and will be forthcoming once funds have been raised. This is supported at Site Allocation Topic Paper Walshaw pg 46 para 27.2 which states that,

"The phasing strategy will be developed through on-going discussions with key stakeholders to ensure the timing of infrastructure delivery. The estimated phasing and delivery trajectory will evolve as the site and allocation are developed further."

The plan for infrastructure is therefore unsound as it is undeliverable and thus the site is not viable.

Insufficient and vague infrastructure for Walshaw has been proposed, with no sources specified. Bury have a very poor reputation for obtaining developer contributions for infrastructure. Developers always try to wriggle out of any obligations. We are told by the Council that the sites are no longer ringfenced so there is no guarantee that promised infrastructure will be delivered.

In respect of the main infrastructure requirements:

Healthcare

There is no specific proposal for additional healthcare facilities. Site Allocation Topic Paper Walshaw at page 43, para 25.1 states that,

"Further work will be required to determine whether there is additional capacity within existing healthcare facilities to meet the increased demands arising from the prospective development."

Education

Whilst there is a plan for an extra primary school in Walshaw, there is no feasible plan to deal with the increased number of secondary school age pupils. Site Allocation Topic Paper Walshaw at page 43, para 24.1 states that,

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 175 secondary age pupils. Current forecasts show both primary and secondary schools in the area are oversubscribed, therefore all additional demand created would require additional school places."

"Cumulative secondary age demand pressures will need to be considered more strategically (Site Allocation Topic Paper Walshaw 24.2)

It is proposed that secondary places will merely be funded from "financial contributions towards secondary school provision" to meet the needs generated by the development (PfE, 24.2). This is not acceptable and will only provide a short term solution. The Elton High School in Vauxhall is currently oversubscribed by 175 places in 2021 and the furthest distance offered from the school is 1/3 of a mile. Distribution of places in Bury secondary schools for September 2021. It is therefore proposed that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution is an additional secondary school in the locality as well as the proposed secondary school. The school needs to be found for them in the immediate area and for the additional primary age pupils in the area as they move through the education system.

Transport

In respect of transport, "The most significant role which PfE will play in this respect is to ensure development in the most sustainable locations which reduce the need for car travel, maximising residential densities around transport hubs." (What are Places for Everyone? - Bury Council)

Walshaw is not situated near to motorway junctions or to transport or employment hubs, therefore it is difficult for residents to travel across Bury to access them. The only improvement to public transport proposed is "a potential upgrade of existing bus services or a new bus service" (PfE, 24.2). A new public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion. As shown in the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows the proposed road will start from a mini roundabout on a narrow residential road, cross a busy main road, Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for cars to pass safely). The road will be sending traffic to all of the same pinch points throughout the town of Irwell. It will exacerbate congestion on local roads, which are already highly congested. No consideration has been taken of the additional traffic which will be produced at the Andrews housing allocation site just down the road from the Walshaw allocation or the increase towards Bolton road.

Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in breach. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of private property developers. There is no indication of how they will be made to keep up with the targets. No sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Bury Council Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for new housing in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) were realistic. So the plan cannot be considered to be effective and fails the test for Soundness.

Housing requirements

Government guidance is clear that standard housing methodology is just a starting point and can be changed in exceptional circumstances - this has not been thoroughly explored. A lack of available land in the area and in particular the economic shock caused by Brexit and Covid 19 have not been taken into account.

There is insufficient confidence in the accuracy of the predictions in the current uncertain economic and climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur if brownfield has been exhausted. A review mechanism should be built in to only include further loss at a later stage if proven necessary. PfE para 1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has stated to the public in Bury that they will implement a brownfield first policy. When questioned at a Council meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement to mean that for anything the council themselves build they would adopt a brownfield first policy. However, as the council have no control over the actions of private developers. In reality they cannot limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 134.

Changes to greenbelt boundaries

As part of the overall plan Bury have modified green belt boundaries and allocations. This makes it appear that less Greenbelt is being sacrificed. The loss of the Walshaw site has not been partially offset by creating extensive but unusable greenbelt in other areas with no regard for exceptional circumstances. This is not in accordance with National Policy.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

The plan is unsound and needs to be rewritten taking into account the issues raised, including:

- using up to date information
- protecting Greenbelt and reviewing alternatives
- proper preparation of infrastructure plans to support the housing & employment needs and secure funding
- proper consultation appropriate to the needs of residents

Family Name

Halliwell

Given Name

Julie

Person ID

1286360

Title

JP-D2 Developer Contributions

Type

Web

Places for Everyone Representation 2021

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	There is nothing within the plans to legally compel developers to build in accordance strategy or for the section 106 planning obligations to fund infrastructure requirements earmarked as such.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	There must be greater legal requirements on developers to contribute towards infrastructure affordable housing in line with independent housing needs assessment and to ensure ecological and resilience does not become residents problems
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Bury - Green Belt Additions
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not	The identified additions are significantly smaller and less able to properly act in line v of greenbelt land as set out in NPPF greenbelt protection. Existing greenbelt which c criteria is proposed to be given up in lieu of small pockets of space which have limite residents

to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Rewrite the plans to remove as far as possible the release of greenbelt land for building for brownfield sites
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Supporting Evidence
Type	Web
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Legality</p> <p>Legal Compliance</p> <ul style="list-style-type: none"> - It is questionable whether PfE and the GMSF can effectively be treated as the same. This must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) PfE is not established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of the plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial' is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. <p>Soundness</p> <p>Soundness</p> <ul style="list-style-type: none"> - The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and take into account the effect of Covid on work patterns. - There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid - There are no partners or industries identified for employment provision. Major partners and employment provision should be identified. - There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input. - The site selection process has been opaque with no explanation as to why some sites were excluded from the plan. <p>https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public</p>

Places for Everyone Representation 2021

should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.

- Several of the authorities involved have consistently failed to meet housing delivery targets. An effective plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind its targets. Clear delivery plans for infrastructure should be included.
- PfE shows removal of greenbelt protection for some areas and creation of greenbelts. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.
- In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.
- There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit housing delivery to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.
- A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for the Manchester City Council area. The revised Local Housing Need methodology states that housing need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.

Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

Places for Everyone Representation 2021

Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	Other Comments
Type	Web

Places for Everyone Representation 2021

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Halliwell
Given Name	Julie
Person ID	1286360
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No